

EXHIBIT B

Michael Giampilis

From: Michael Giampilis
Sent: Tuesday, December 31, 2024 3:38 PM
To: Steven Moser
Cc: Shirley Navarro-Losito
Subject: RE: Cruz v Demarco - Discovery Requests

Fair enough.

Michael P. Giampilis, Esq.
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From: Steven Moser <steven.moser@moserlawfirm.com>
Sent: Tuesday, December 31, 2024 10:43 AM
To: Michael Giampilis <mgiamplis@giampilislaw.com>
Cc: Shirley Navarro-Losito <shirleylosito@moserlawfirm.com>
Subject: RE: Cruz v Demarco - Discovery Requests

Mike

The last time we spoke you indicate that we would have the discovery responses before the holidays. Please provide the discovery responses on or before January 8, 2025.

Steve



Steven J. Moser
Managing Attorney, Moser Law Firm, PC
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 steven.moser@moserlawfirm.com

From: Michael Giampilis <mgiamplis@giampilislaw.com>
Sent: Tuesday, December 17, 2024 12:00 PM
To: Steven Moser <steven.moser@moserlawfirm.com>
Cc: Shirley Navarro-Losito <shirleylosito@moserlawfirm.com>
Subject: RE: Cruz v Demarco - Discovery Requests

516-739-5838

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From: Steven Moser <steven.moser@moserlawfirm.com>
Sent: Tuesday, December 17, 2024 10:13 AM
To: Michael Giampilis <mgiamplis@giampilislaw.com>
Cc: Shirley Navarro-Losito <shirleylosito@moserlawfirm.com>
Subject: Re: Cruz v Demarco - Discovery Requests

Great,

I'll call you after 4 today. What number?

Steven Moser
MOSER LAW FIRM PC
133C New York Ave

Michael Giampilis

From: Michael Giampilis
Sent: Wednesday, January 8, 2025 12:01 PM
To: Steven Moser
Subject: Cruz v. Demarco Bros. ...; EDNY Case No. 23-9200
Attachments: Demarco. Cruz Discovery Demand Responses.1.7.25.PDF; Demarco. Cruz Interrogatory Responses. 1.7.25.PDF

Good Morning Steve:

I have attached Defendants' responses to your open October 30, 2024 discovery demands and interrogatories. Let me know if you want hard copies mailed to your office.

My client is available to sit for your deposition on January 30, February 3, 4, 6, 11, 13. Please confirm which dates work for you.

Additionally, kindly advise when your clients can be made available to sit for my deposition in February.

Sincerely,
Michael

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